

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF IOWA

In re: )  
 ) Chapter 11  
Ryan's Electrical Services, LLC, )  
 ) Bankruptcy No. 20-00411  
Debtor. )

**REQUEST FOR ALLOWANCE AND PAYMENT OF SECTION 503(b)(9)**  
**ADMINISTRATIVE CLAIM**

Creditor Consolidated Electrical Distributors, Inc. d/b/a Electrical Engineering & Equipment (“3E”), by and through its undersigned counsel, submits this *Request for Allowance and Payment of Section 503(b)(9) Administrative Claim*, and in support thereof respectfully states as follows:

1. On March 25, 2020 (the “Petition Date”), Ryan’s Electrical Services, LLC (the “Debtor”) filed a petition for relief under Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the District of Iowa.
2. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.
3. 3E is a distributor of electrical engineering equipment with its principal place of business at 953 73<sup>rd</sup> Street, Windsor Heights, IA 50324.
4. Within the twenty (20) days immediately preceding the Petition Date (the “503(b)(9) Period”), 3E sold and Debtor received certain goods (“Goods”) in the ordinary course of Debtor’s business, which have an aggregate value of \$13,421.50 (the “Administrative Expense Claim”). Copies of the invoices detailing the Goods sold to the Debtor during the 503(b)(9) Period, and evidence of delivery, are attached hereto as **Exhibit A** and incorporated by reference. 3E has not been paid for these Goods.

5. Section 503(b)(9) of the Bankruptcy Code, 11 U.S.C. § 503(b)(9), provides that, after notice and a hearing, the bankruptcy court shall allow an administrative expense for claims of a seller for the value of any goods received by the debtor in the ordinary course of business within twenty (20) days prior to the filing of its bankruptcy petition. 3E is entitled to an administrative expense claim for the value of the Goods sold to and received by the Debtor.

6. 3E reserves its right to assert additional claims against the Debtor for amounts not contemplated by this request or allowed by the Court pursuant to § 503(b)(9) of the Bankruptcy Code, and to amend, modify, and/or supplement this request, as appropriate under the circumstances.

WHEREFORE, 3E respectfully asks the Court to enter an order allowing 3E's Administrative Expense Claim pursuant to Section 503(b)(9) of the Bankruptcy Code and grant such other and further relief as this Court deems just and appropriate.

**Notice**

Please take notice that any objection or resistance to this *Request for Allowance and Payment of Section 503(b)(9) Administrative Claim* must be filed on or before **June 3, 2020** (the "Resistance Date"). If no objection or resistance is timely filed on or before the Resistance Date, the Court may enter an order in favor of the moving party.

Dated this 13<sup>th</sup> day of May, 2020.

HUSCH BLACKWELL LLP  
Attorneys for Consolidated Electrical  
Distributors, Inc. d/b/a Electrical Engineering  
& Equipment Company

By: /s/ Michael D. Fielding  
Michael D. Fielding (AT0013551)  
4801 Main Street, Suite 1000  
Kansas City, MO 64112  
816.983.8353  
816.983.808 (fax)  
[michael.fielding@huschblackwell.com](mailto:michael.fielding@huschblackwell.com)

**CERTIFICATE OF SERVICE**

I do hereby certify that the foregoing Request for Allowance and Payment of Section 503(b)(9) Administrative Claim was filed with the Clerk of the Court using the CM/ECF system which gave notification electronically upon all parties, and I hereby certify that I have also mailed the same by regular United States mail, postage prepaid, to the following this 13<sup>th</sup> day of May, 2020:

L. Ashley Zubal  
U.S. Trustee  
210 Walnut Street, Rm 793  
Des Moines, IA 50309-2108

Kevin D. Ahrenholz  
620 Lafayette Street  
P. O. Box 178  
Waterloo, IA 50704-0178

Robert Cardell Gainer  
Cutler Law Firm  
1307 50<sup>th</sup> Street  
West Des Moines, IA 50266

Douglas Dean Flugum  
Bugeye Ventures, Inc.  
P. O. Box 308  
Cedar Rapids, IA 52406

/s/ Michael D. Fielding  
Michael D. Fielding



**ELECTRICAL ENGINEERING & EQUIPMENT CO.**  
 953 73RD ST  
 WINDSOR HEIGHTS, IA 50324  
 (515)273-0100 FAX (515)273-0108

**INVOICE**

CUST.#: 261157  
 SHIP TO: RYANS ELECTRICAL SERVICES - A  
 CAMP DODGE M-05 ALTERATIONS  
 6950 NE 14TH ST STE 36  
 ANKENY, IA 50023

BILL TO: RYANS ELECTRICAL SERVICES - A  
 6950 NE 14TH ST STE 36  
 ANKENY, IA 50023

INVOICE DATE	INVOICE NO.	
03/16/20	6618023-00	
P.O. NO.		PAGE #
338-14560		1

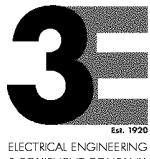
CORRESPONDENCE TO:  
 Electrical Engineering & Equipment Co.  
 P.O. Box 310365  
 Des Moines, IA 50331-0365

INSTRUCTIONS	REFERENCE		CASH DISCOUNT:
HARLEY 515.289.4090		ATTN: HARLEY	44.48
SHIP POINT	SHIP VIA	SHIPPED	IF PAID BY:
** Drop Ship **	Direct	03/16/20	04/10/20

LINE NO.	PRODUCT AND DESCRIPTION	QUANTITY ORDERED	QUANTITY B.O.	QTY. SHIPPED	QTY. U/M	NET PRICE	AMOUNT (NET)
1	HUB LCAT24-40LWG-EDU MARK:TYPE L1	38	0	38	each	82.00	3116.00
2	HUB MPS4-40LW-CW-EDU MARK:TYPE L2	1	1	0	each	82.00	0.00
5	DUA PGNW MARK:TYPE L4	1	1	0	each	326.00	0.00
6	HUB LTR-6RD-H-ML20L- DM1 MARK:TYPE LR1	1	1	0	each	209.00	0.00
7	HUB LTR-6RD-T-ML40K8XW -SS MARK:TYPE LR1	1	0	1	each	0.00	0.00
8	HUB EV2 MARK:TYPE E1	5	0	5	each	47.00	235.00
9	DUA LM130-12VI-0 MARK:TYPE E2	1	1	0	each	414.00	0.00
10	DUA EVEURWE MARK:TYPE X1	2	0	2	each	36.00	72.00
11	HCS LOT PRICE FOR THE FOLLOWING CONTROLS:	1	0	1	each	1025.00	1025.00
12	HCS LHIRS1-G-IV	8	0	8	each	0.00	0.00
13	HCS OMNIUS2000RP	3	0	3	each	0.00	0.00
14	HCS UVPP	1	0	1	each	0.00	0.00
				Cash Discount	44.48	If Paid By	04/10/20

Continued

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ELECTRICAL ENGINEERING  
& EQUIPMENT COMPANY

**ELECTRICAL ENGINEERING & EQUIPMENT CO.**  
953 73RD ST  
WINDSOR HEIGHTS, IA 50324  
(515)273-0100 FAX (515)273-0108

## INVOICE

CUST.#: 261157  
SHIP TO: RYANS ELECTRICAL SERVICES - A  
CAMP DODGE M-05 ALTERATIONS  
6950 NE 14TH ST STE 36  
ANKENY, IA 50023

INVOICE DATE	INVOICE NO.
03/16/20	6618023-00
P.O. NO.	PAGE #
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BILL TO: RYANS ELECTRICAL SERVICES - A  
6950 NE 14TH ST STE 36  
ANKENY, IA 50023

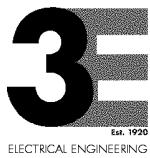
CORRESPONDENCE TO:  
Electrical Engineering & Equipment Co.  
P.O. Box 310365  
Des Moines, IA 50331-0365

INSTRUCTIONS	REFERENCE		CASH DISCOUNT:
SHIP POINT			IF PAID BY:
** Drop Ship **	ATTN: HARLEY	44.48	
	Direct	03/16/20	04/10/20

LINE NO.	PRODUCT AND DESCRIPTION	QUANTITY ORDERED	QUANTITY B.O.	QTY. SHIPPED	QTY. U/M	NET PRICE	AMOUNT (NET)
12	Lines Total		Qty Shipped Total	59	Total		4448.00
					Invoice Total		4448.00

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**ELECTRICAL ENGINEERING & EQUIPMENT CO.**  
953 73RD ST  
WINDSOR HEIGHTS, IA 50324  
(515)273-0100 FAX (515)273-0108

## INVOICE

CUST.#: 261157  
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CAMP DODGE M-05 ALTERATIONS  
6950 NE 14TH ST STE 36  
ANKENY, IA 50023

INVOICE DATE	INVOICE NO.
03/19/20	6618023-01
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BILL TO: RYANS ELECTRICAL SERVICES - A  
6950 NE 14TH ST STE 36  
ANKENY, IA 50023

CORRESPONDENCE TO:  
Electrical Engineering & Equipment Co.  
P.O. Box 310365  
Des Moines, IA 50331-0365

INSTRUCTIONS	REFERENCE		CASH DISCOUNT:
HARLEY 515.289.4090	ATTN: HARLEY		4.96
SHIP POINT	SHIP VIA	SHIPPED	IF PAID BY:
** Drop Ship **	Direct	03/17/20	04/10/20

LINE NO.	PRODUCT AND DESCRIPTION	QUANTITY ORDERED	QUANTITY B.O.	QTY. SHIPPED	QTY. U/M	NET PRICE	AMOUNT (NET)
2	HUB MPS4-40LW-CW-EDU MARK:TYPE L2	1	0	1	each	82.00	82.00
5	DUA PGNW MARK:TYPE L4	1	1	0	each	326.00	0.00
6	HUB LTR-6RD-H-ML20L- DM1 MARK:TYPE LR1	1	1	0	each	209.00	0.00
9	DUA LM130-12VI-0 MARK:TYPE E2	1	0	1	each	414.00	414.00
4	Lines Total	Qty Shipped Total		2	Total Invoice Total	496.00	496.00

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**ELECTRICAL ENGINEERING & EQUIPMENT CO.**  
953 73RD ST  
WINDSOR HEIGHTS, IA 50324  
(515)273-0100 FAX (515)273-0108

## INVOICE

CUST.#: 261157  
SHIP TO: RYANS ELECTRICAL SERVICES - A  
CAMP DODGE M-05 ALTERATIONS  
6950 NE 14TH ST STE 36  
ANKENY, IA 50023

INVOICE DATE	INVOICE NO.
03/24/20	6618023-02
P.O. NO.	PAGE #
338-14560	1

BILL TO: RYANS ELECTRICAL SERVICES - A  
6950 NE 14TH ST STE 36  
ANKENY, IA 50023

CORRESPONDENCE TO:  
Electrical Engineering & Equipment Co.  
P.O. Box 310365  
Des Moines, IA 50331-0365

INSTRUCTIONS	REFERENCE		CASH DISCOUNT:
HARLEY 515.289.4090	ATTN: HARLEY		3.26
SHIP POINT	SHIP VIA	SHIPPED	IF PAID BY:
** Drop Ship **	UPS GROUND	03/23/20	04/10/20

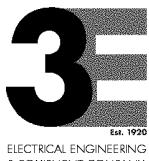
LINE NO.	PRODUCT AND DESCRIPTION	QUANTITY ORDERED	QUANTITY B.O.	QTY. SHIPPED	QTY. U/M	NET PRICE	AMOUNT (NET)
5	DUA PGNW MARK:TYPE L4	1	0	1	each	326.00	326.00
6	HUB LTR-6RD-H-ML20L- DM1 MARK:TYPE LR1	1	1	0	each	209.00	0.00
2	Lines Total	Qty Shipped	Total	1	Total Invoice Total	326.00	326.00

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## Cash Discount

3.26 If Paid By 04/10/20



**ELECTRICAL ENGINEERING & EQUIPMENT CO.**  
 953 73RD ST  
 WINDSOR HEIGHTS, IA 50324  
 (515)273-0100 FAX (515)273-0108

**INVOICE**

CUST.#: 261157  
 SHIP TO: RYANS ELECTRICAL SERVICES - A  
 CAMP DODGE B-16 & B-17  
 7105 NW 70TH AVE.  
 JOHNSTON, IA 50131

BILL TO: RYANS ELECTRICAL SERVICES - A  
 6950 NE 14TH ST STE 36  
 ANKENY, IA 50023

INVOICE DATE	INVOICE NO.	
03/11/20	6727781-00	
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349-014716		1

CORRESPONDENCE TO:  
 Electrical Engineering & Equipment Co.  
 P.O. Box 310365  
 Des Moines, IA 50331-0365

INSTRUCTIONS	REFERENCE	CASH DISCOUNT:	
JEFF 319-529-3798		0.00	
SHIP POINT	SHIP VIA	SHIPPED	IF PAID BY:
3E - WINDSOR HEIGHTS	OT West WinH	03/11/20	03/11/20

LINE NO.	PRODUCT AND DESCRIPTION	QUANTITY ORDERED	QUANTITY B.O.	QTY. SHIPPED	QTY. U/M	NET PRICE	AMOUNT (NET)
1	COND EMT 100 1 IN EMT CONDUIT	1500	0	1500	C	115.11	1726.65
2	COND EMT 075 3/4 IN EMT CONDUIT	2500	0	2500	C	66.98	1674.50
3	APP 7100S 1 IN COMP EMT CONN	50	0	50	C	40.85	20.43
4	APP 7075S 3/4 COMP EMT CONN	200	0	200	C	25.98	51.96
5	APP 6075S 3/4 COMP EMT CPLG	100	0	100	C	31.64	31.64
6	RAC 232 4SQ 2-1/8D BOX COMB KO	200	0	200	C	84.95	169.90
7	RAC 233 4SQ 2-1/8D BOX 1IN KO	50	0	50	C	111.21	55.61
8	CAD C6 BOX SUPPORT F/6-IN STUDS	66	0	66	C	186.58	123.14
9	MIN MINE55 1 IN 1H EMT STRAP	200	0	200	C	27.40	54.80
10	MIN MINE45 3/4 1H EMT STRAP	300	0	300	C	15.59	46.77
11	DOT KW812 8 X 1/2 K-LATH PHILLIPS WAFER HEAD METAL PIERCIN	400	0	400	C	3.38	13.52
12	DOT RMC6322 6-32 X 2 ROUND HEAD SLOTTED/PHLP MACH ZN	100	0	100	C	7.89	7.89
				Cash Discount	0.00	If Paid By	03/11/20

Continued

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ELECTRICAL ENGINEERING  
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**ELECTRICAL ENGINEERING & EQUIPMENT CO.**  
 953 73RD ST  
 WINDSOR HEIGHTS, IA 50324  
 (515)273-0100 FAX (515)273-0108

**INVOICE**

CUST.#: 261157  
 SHIP TO: RYANS ELECTRICAL SERVICES - A  
 CAMP DODGE B-16 & B-17  
 7105 NW 70TH AVE.  
 JOHNSTON, IA 50131

BILL TO: RYANS ELECTRICAL SERVICES - A  
 6950 NE 14TH ST STE 36  
 ANKENY, IA 50023

INVOICE DATE	INVOICE NO.
03/11/20	6727781-00
P.O. NO.	
349-014716	2

CORRESPONDENCE TO:  
 Electrical Engineering & Equipment Co.  
 P.O. Box 310365  
 Des Moines, IA 50331-0365

INSTRUCTIONS	REFERENCE		CASH DISCOUNT:
	JEFF 319-529-3798		0.00
SHIP POINT	SHIP VIA	SHIPPED	IF PAID BY:
3E - WINDSOR HEIGHTS	OT West WinH	03/11/20	03/11/20

LINE NO.	PRODUCT AND DESCRIPTION	QUANTITY ORDERED	QUANTITY B.O.	QTY. SHIPPED	QTY. U/M	NET PRICE	AMOUNT (NET)
13	DOT RMC8322 8-32 X 2IN ROUND HEAD SLOTTED/PHLP MACH ZN	100	0	100	C	8.74	8.74
14	RAC 5324-0 1G WP BOX W/3 3/4IN HUBS	6	0	6	C	368.87	22.13
15	COND PVC SCH40 300 49013 3 IN SCH 40 PVC CONDUIT	200	0	200	C	126.61	253.22
16	PVC E940L 3 SCH 40 CPLG	20	0	20	C	128.82	25.76
17	PVC UA9AL 3 IN SCH 40 STD 90D EL	6	0	6	E	4.93	29.58
18	PVC VC9982 QUICK SET CEMENT - QUART 31352	3	0	3	C	1073.66	32.21
19	CAD 615880 5/8 IN X 8FT CU GROUND ROD PR 182051	2	0	2	E	12.67	25.34
20	CAD CP58 5/8 IN ECONOMY GRD ROD CLAMP FITS 1/2 -5/8 G5	2	0	2	E	1.57	3.14
21	COND PVC SCH40 200 49011 2 IN SCH 40 PVC CONDUIT	130	0	130	C	66.14	85.98
22	PVC E940J 2 IN SCH 40 CPLG	12	0	12	C	43.04	5.16
23	PVC E997J 2 IN SCH 40 END BELL	4	0	4	C	288.08	11.52
23	Lines Total		Qty Shipped Total	6151	Total	4479.59	
					Taxes	313.57	
					Invoice Total	4793.16	
					Cash Discount	0.00	If Paid By 03/11/20

Last Page

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**ELECTRICAL ENGINEERING & EQUIPMENT CO.**  
953 73RD ST  
WINDSOR HEIGHTS, IA 50324  
(515)273-0100 FAX (515)273-0108

# INVOICE

CUST.#: 261157  
SHIP TO: RYANS ELECTRICAL SERVICES - A  
CAMP DODGE B-16 & B-17  
1920 SE 41ST  
GRIMES, IA 50111

BILL TO: RYANS ELECTRICAL SERVICES - A  
6950 NE 14TH ST STE 36  
ANKENY, IA 50023

INVOICE DATE	INVOICE NO.
03/16/20	6729584-00
349-14719	1

CORRESPONDENCE TO:  
Electrical Engineering & Equipment Co.  
P.O. Box 310365  
Des Moines, IA 50331-0365

INSTRUCTIONS	REFERENCE	CASH DISCOUNT:
CALL ALAN 319-415-4595		0.00
SHIP POINT	SHIP VIA	SHIPPED
3E - WINDSOR HEIGHTS	WH PU ON WAY	03/16/20
		03/16/20

LINE NO.	PRODUCT AND DESCRIPTION	QUANTITY ORDERED	QUANTITY B.O.	QTY. SHIPPED	QTY. U/M	NET PRICE	AMOUNT (NET)
1	RAC 769 4IN SQ 5/8D 2G SW RING	40	0	40	C	45.56	18.22
2	RAC 768 4IN SQ 5/8D 1G SW RING	50	0	50	C	39.17	19.59
2	Lines Total		Qty Shipped Total	90	Total Taxes Invoice Total	37.81 2.65 40.46	

Cash Discount 0.00 If Paid By 03/16/20



ELECTRICAL ENGINEERING  
& EQUIPMENT COMPANY

**ELECTRICAL ENGINEERING & EQUIPMENT CO.**  
953 73RD ST  
WINDSOR HEIGHTS, IA 50324  
(515)273-0100 FAX (515)273-0108

## INVOICE

CUST.#: 261157  
SHIP TO: RYANS ELECTRICAL SERVICES - A  
CAMP DODGE B-16 & B-17  
1920 SE 41ST  
GRIMES, IA 50111

INVOICE DATE	INVOICE NO.
03/24/20	6731091-01
P.O. NO.	PAGE #
349-14698	1

BILL TO: RYANS ELECTRICAL SERVICES - A  
6950 NE 14TH ST STE 36  
ANKENY, IA 50023

CORRESPONDENCE TO:  
Electrical Engineering & Equipment Co.  
P.O. Box 310365  
Des Moines, IA 50331-0365

INSTRUCTIONS	REFERENCE		CASH DISCOUNT:
	Q-1226084 Q2C 42842858		0.00
SHIP POINT	SHIP VIA	SHIPPED	IF PAID BY:
** Drop Ship **	UPS GROUND	03/23/20	03/24/20

LINE NO.	PRODUCT AND DESCRIPTION	QUANTITY ORDERED	QUANTITY B.O.	QTY. SHIPPED	QTY. U/M	NET PRICE	AMOUNT (NET)
3	NQ MB PNLB (INT BOX TRI PANEL P-16	1	1	0	each	0.00	0.00
4	SSP01EMA32	2	0	2	each	0.00	0.00
5	NQ MB PNLB (INT BOX TRI PANEL P-17	1	1	0	each	0.00	0.00
10	SQD LOTPRICE-1 Non Stock	1	0	1	each	3249.00	3249.00
11	SQD LOTPRICE-2 Non Stock	1	1	0	each	1576.00	0.00
5	Lines Total	Qty Shipped	Total	3	Total Invoice Total	3249.00	3249.00

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**ELECTRICAL ENGINEERING & EQUIPMENT CO.**  
953 73RD ST  
WINDSOR HEIGHTS, IA 50324  
(515)273-0100 FAX (515)273-0108

# INVOICE

CUST.#: 261157  
SHIP TO: RYANS ELECTRICAL SERVICES - A  
CAMP DODGE B-16 & B-17

JOHNSTON, IA 50131

BILL TO: RYANS ELECTRICAL SERVICES - A  
6950 NE 14TH ST STE 36

ANKENY, IA 50023

INVOICE DATE	INVOICE NO.
03/18/20	6734114-00
P.O. NO.	PAGE #
349-14726	1

CORRESPONDENCE TO:  
Electrical Engineering & Equipment Co.  
P.O. Box 310365  
Des Moines, IA 50331-0365

INSTRUCTIONS		CASH DISCOUNT:	
		0.00	
SHIP POINT	SHIP VIA	SHIPPED	IF PAID BY:
3E - WINDSOR HEIGHTS	WH PU ON WAY	03/18/20	03/18/20

LINE NO.	PRODUCT AND DESCRIPTION	QUANTITY ORDERED	QUANTITY B.O.	QTY. SHIPPED	QTY. U/M	NET PRICE	AMOUNT (NET)
1	CAD TSGB16 16 IN OUTLET BOX BRACKET ADJ SCREW GUN BRACKET	30	0	30	C	214.57	64.37
1	Lines Total	Qty Shipped Total		30	Total Taxes	64.37 4.51	Invoice Total 68.88

Cash Discount 0.00 If Paid By 03/18/20

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